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DATE FILED: 5/5/11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER DISASTER SITE
LITIGATION

21 MC 100 (AKH)

ROBERT GOFFREDO,
Plaintiff,

**STIPULATION OF
VOLUNTARY DISMISSAL**

-Against-

Civil Action Number 04CV9168

CITY OF NEW YORK,
Defendant


IT IS HEREBY STIPULATED AND AGREED, by and between the parties in the above-captioned consolidated action that, pursuant to the Federal Rule of Civil Procedure 41(a)(1)(A)(ii):

1. The Plaintiff's actions are voluntarily dismissed with prejudice pursuant to the following terms and conditions:
2. All claims by the Plaintiff against the Defendant arising out of or relating in any way to the World Trade Center-related rescue, recovery, and/or debris-removal operations and/or clean up at any location on and/or after September 11, 2001, are voluntarily dismissed with prejudice.
3. All claims that were asserted or could have been brought in relation to the Plaintiffs' pleadings are dismissed with prejudice.
4. The dismissal is without prejudice solely in relation to the extent permitted by New York State law and as may be defined by any court having jurisdiction over any such later-filed complaint. If after this Stipulation is filed Plaintiff commences an action asserting such alleged second injury claims against any or all of the entities listed on Exhibit A to the World Trade Center Litigation Settlement Process Agreement, As Amended ("Amended SPA"), such action shall constitute a "New Debris Removal Claim" as defined in the Amended SPA.

5. The dismissal is without costs.

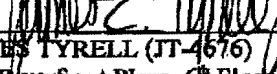
Dated: New York, New York
April 20, 2011

~~BARASCH MCGARRY SALZMAN & PENSON~~

By: 
EDWARD MARCOWITZ (EM-9620)
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Dated: New York, New York
April 25, 2011

~~PATTON BOGGS LLP~~

By: 
JAMES TYRELL (JT-4676)
One Riverfront Plaza, 6th Floor
Newark, New Jersey 07102
(973) 848-5600

*So ordered
5/5/11*

John T. Heller 